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Company GUC Trust*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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	:
<b>In re</b>	:
	:
<b>MOTORS LIQUIDATION COMPANY, et al.,</b>	:
<b>f/k/a General Motors Corp., et al.</b>	:
	:
<b>Debtors.</b>	:
	:
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	<b>Chapter 11 Case No.</b>
	<b>09-50026 (REG)</b>
	<b>(Jointly Administered)</b>

**APPELLEE’S DESIGNATION OF ADDITIONAL ITEMS  
TO BE INCLUDED IN THE RECORD TO BE PRESENTED ON APPEAL**

Pursuant to Rule 8006 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), the Motors Liquidation Company GUC Trust (the “**GUC Trust**”), as appellee, formed by the above-captioned debtors (the “**Debtors**”) in connection with the Debtors’ Second Amended Joint Chapter 11 Plan, dated March 18, 2011 (as may be amended, supplemented, or modified from time to time, the “**Plan**”), respectfully submits the following designation of additional items (the “**Additional Designated Items**”) to be included in the record of the appeal filed by William Kuntz (the “**Appellant**”) from the Bankruptcy Court’s Order dated November 9, 2011 (Docket No. 11127) and on October 24, 2012 (Docket No. 12160). The GUC Trust requests that the Additional Designated Items be included in the record to be presented on appeal to the District Court for the Southern District of New York in addition to the items designated by

Appellant (Docket No. 12211). While it appears Appellant may have intended to include some of the Additional Designated Items in his submission, we include them here out of an abundance of caution to clarify the dates of each item and to number the items for ease of reference. The GUC Trust reserves the right to seek clarification and object to the statement of issues raised on appeal<sup>1</sup> and to further supplement the record if necessary.

**ADDITIONAL DESIGNATED ITEMS<sup>2</sup>**

**Case No. 09-50026 (REG)**

Item	Date	Docket No.	Description
1.	9/23/2011	10941	Objection to Claims Notice of 248th Omnibus Objection to Claims (Insufficient Documentation) filed by Barry N. Seidel on behalf of Motors Liquidation Company GUC Trust
2.	10/21/2011	11064	Response/Reply to Objection to Claims filed by William Kuntz III
3.	10/25/2011	11074	Response/Reply to Response of William Kuntz to 248th Omnibus Objection to Claims
4.	10/27/2011	11083	Affidavit of Service of Barbara Kelley Keane of Reply to Response of William Kuntz to 248th Omnibus Objection to Claims (Insufficient Documentation)
5.	10/27/2011	11084	Response of Claimant, William Kuntz III to Debtors Counsel's Paper filed by William Kuntz III
6.	10/31/2011	11098	Notice of Proposed Order Granting Debtors' Objection to Proof of Claim Numbers 1092, 1093 and 1398 filed by William Kuntz III
7.	10/28/2011	11103	Certificate of Mailing filed by William Kuntz III
8.	10/31/2011	11105	Transcript regarding Hearing Held on 10/28/2011
9.	11/02/2011	11106	Letter, dated 11/02/2011, addressed to Judge Gerber (related document(s) 11074) filed by Barry N. Seidel on behalf of Motors Liquidation Company GUC Trust
10.	11/02/2011	11111	Affidavit of Service of Barbara Kelley Keane of Notice of Presentment of Proposed Order Granting Debtors' Objection to Proof of Claim Numbers 1092, 1093 and 1398 Filed by William Kuntz III

<sup>1</sup> For example, the issues, as they are currently drafted by Appellant, appear to indicate that Mr. Kuntz is appealing the order dated November 9, 2011 (Item 13 above). Such an appeal would be untimely and subject to dismissal for lack of subject matter jurisdiction. Fed. R. Bankr. P. 8002.

<sup>2</sup> To the extent any of the below listed documents contain exhibits or attachments that are not specifically designated, all such exhibits and attachments are included in this designation.

Item	Date	Docket No.	Description
11.	11/03/2011	11113	Affidavit of Service of Barbara Kelley Keane of Letter from Stefanie Birbrower Greer, Dickstein Shapiro LLP, counsel for Motors Liquidation Company GUC Trust, to United States Bankruptcy Judge Robert E. Gerber, United States Bankruptcy Court, Southern District of New York, dated November 2, 2011, regarding and enclosing Proof of Claims Nos. 1092, 1093 and 1398 of William Kuntz
12.	11/04/2011	11118	Letter dated 11/3/2011 Re: Proof of Claim filed by William Kuntz III
13.	11/09/2011	11127	Order signed on 11/9/2011 Granting 248th Omnibus Objection As To Claim Numbers 1092, 1093 And 1398 Filed By William Kuntz III
14.	11/11/2011	11133	Affidavit of Service of Barbara Kelley Keane of Order Granting 248th Omnibus Objection As To Claim Numbers 1092, 1093 and 1398 Filed by William Kuntz III
15.	10/17/2012	12152	Motion to Approve to Reinstating Proof of Claims filed by William Kuntz III
16.	10/24/2012	12160	Endorsed Order signed on 10/22/2012 "Deeming this Motion to be One for Relief Under FRBP 9024, Motion Denied. It Fails to Assert any Matter that the Court Overlooked or that Might have Changed the Result."
17.	11/08/2012	12192	Notice of Appeal (related document(s) 12160) filed by William Kuntz III
18.	11/14/2012	12194	Motion to Extend Time to file Notice of Appeal filed by William Kuntz III

Dated: New York, New York  
December 20, 2012

/s/ Stefanie Birbrower Greer  
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